

EXHIBIT A

Notice of Service of Process

Dover, DE • Los Angeles • Sacramento • Springfield, IL • Albany • New York

850 New Burton Road, Suite 201, Dover, Delaware 19904
(302) 734-1450 Toll Free (866) 621-3524
Fax (800) 253-5177 Email: sop@nationalcorp.com

DATE: January 11, 2016
TO: William J Sichko, Jr.
PQ Corporation
300 Lindenwood Dr.
Valleybrooke Corporate Center
Malvern, PA 19355
RE: SERVICE OF PROCESS:
PQ CORPORATION

SENT VIA:
☒ Email
☒ Federal Express
☐ Fascimile Transmission
☐ Other:
Tracking Number:
775386550205

The enclosed Service of Process was received by the statutory agent in: **Illinois**
on the date of: **January 11, 2016**
received via: **Personal Service**

TITLE OF ACTION: Gary Puhr vs. PQ CORPORATION

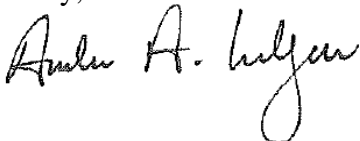
COURT AND CASE NO: In the 20th Judicial Circuit Court in and for Will County, Illinois

Case No. 15 L -0912
Summons and Complaint

RESPONSE REQUIRED BY: see documents

NOTE:

Sincerely,



Andrew Lundgren, Manager - Registered Agent Services

Please carefully review the document referenced above to confirm all information, including the Response Date, for accuracy. The information noted above is provided based on our review and is not a legal opinion.

PLEASE CONSULT THE SERVICES OF A COMPETENT PROFESSIONAL ATTORNEY.

STATE OF ILLINOIS)
)SS
 COUNTY OF WILL)

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
 WILL COUNTY, ILLINOIS

GARY PUHR

VS

CASE NO: 15th L-0912

PQ CORPORATION

SUMMONS

To each defendant:

You are summoned and required to file an answer in this case, or otherwise file your appearance in the Office of the Clerk of this Court
14 W. Jefferson Street Building, Room 212
Joliet, IL 60432, Illinois within 30 days after service

(Address)

(City)

of this summons, not

counting the day of service. IF YOU FAIL TO DO SO, A JUDGEMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR
 THE RELIEF ASKED IN THE COMPLAINT.

Please Serve: National Corporate Research, LLC

To the officer:

600 S. Second Street, Suite 404, Springfield, IL 62704

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if
 any, immediately after service. If service cannot be made, summons shall be returned to endorsed.

This summons may not be served later than 30 days after its date.

WITNESS: DEC 23 2015, 20

PAMELA J. MCGUIRE

PAMELA J. McGUIRE

Clerk of the Circuit Court

BY: _____
 (Deputy)

(Seal of Court)

(Plaintiff's Attorney or Plaintiff if he is not represented by an Attorney)

NAME: Glenn C. Ronaldson, Esq.

ARDC# 06187334

Attorney for: Plaintiff (Ronaldson & Kuchler, LLC)

Address: 19 S. LaSalle Street, Suite 1402

City: Chicago, IL 60603

Telephone: 312-425-2600

ATTORNEY ID 06187334
STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

FILED

2015 DEC 23 10:20

CLERK, CIRCUIT COURT
WILL COUNTY, ILLINOIS

GARY PUHR,

Plaintiff,

vs.

PQ CORPORATION,

Defendant.

No. 15 L-0912

JURY TRIAL DEMANDED

COMPLAINT AT LAW

The Plaintiff, GARY PUHR, by his attorneys, the law firm of RONALDSON AND KUCHLER, L.L.C., and complaining of the Defendant, PQ CORPORATION, states and alleges as follows:

1. At all times relevant herein, and specifically on December 31, 2013, the Plaintiff, Gary Puhr, was a resident of the City of Oak Lawn, County of Cook and citizen of the State of Illinois.
2. At all times relevant herein, and specifically on December 31, 2013, PQ Corporation (hereinafter "PQ") was a Pennsylvanian corporation doing business in the state of Illinois at 111 Ingalls Ave. in the City of Joliet, County of Will, within the State of Illinois.
3. At all times relevant herein, the Plaintiff was employed by Univar USA as a driver for Univar transporting chemicals.
4. On December 31, 2013, the Plaintiff, Gary Puhr, in the course of his employment with Univar, was transporting chemicals to an unloading area at the PQ plant at 111 Ingalls Ave. in the City of Joliet, County of Will, within the State of Illinois.

5. At the time and place alleged, as the Plaintiff, Gary Puhr, connected the hose from the container in his truck to the container in the PQ unloading area, he realized the air lines were blocked and/or frozen.
6. At the time and place alleged, the Plaintiff used a PQ condensation hose with a small amount of steam coming out, in line with PQ maintenance guidelines, to thaw the line to the truck.
7. At the time and place alleged, the Plaintiff also used a heat gun from PQ maintenance in an attempt to heat up the air line to ensure a low pressure and steady flow, taking notice that nothing had emptied out of the truck while he was working.
8. At the time and place alleged, the Plaintiff was standing in what appeared to be water that had pooled by the Plaintiff's truck in the unloading area instead of draining properly, creating a puddle that was, in fact, a caustic chemical.
9. That at all times relevant herein, the Plaintiff, Gary Puhr, was in the exercise of ordinary care for his own safety, wearing personal protective equipment.
10. At all times relevant herein, the Defendant, PQ, had a duty to exercise reasonable care in the maintenance and proper drainage of its unloading area at the Joliet plant.
11. That at said time and place, the Defendant, PQ, was guilty of one or more of the following negligent acts and/or omissions:
 - a. Failed to issue warnings that required all workers at the unloading area to wear rubber boots.
 - b. Failed to maintain a properly functioning and clear drainage area where Plaintiff and others had to work;

c. Failed to maintain its unloading area at the Joliet plant to provide for proper drainage and disposal of all liquids;

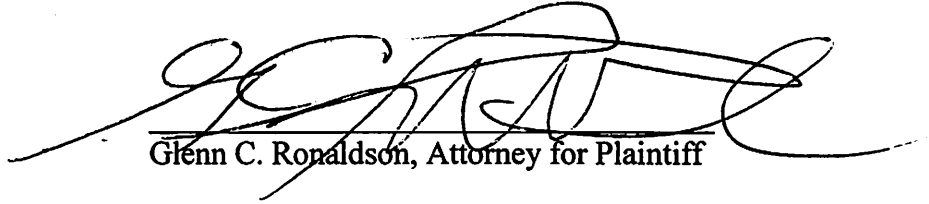
12. That as a direct and proximate result of one or more or all of the foregoing negligent acts or omissions of the Defendant, the Plaintiff, Gary Puhr, severely burned his feet on the pooled caustic chemical liquid, leading to permanent chemical scarring.

13. That as a direct and proximate result of the aforementioned careless and/or negligent acts and/or omissions of the Defendant, PQ, the Plaintiff, Gary Puhr, suffered severe injuries of permanent and lasting nature, which have caused and will continue to cause pain in the body and mind, and the Plaintiff will continue to suffer from said injuries, pain and suffering and conditions in the future, and the Plaintiff was caused to expend and in the future will be compelled to expend large sums of money for medical care in endeavoring to be cured of these injuries; and the Plaintiff was caused to and did lose much time from his employment, thereby incurring lost sums of money and the Plaintiff has been and in the future will be prevented from attending to his usual affairs and duties.

WHEREFORE, the Plaintiff, GARY PUHR, prays that this Honorable Court enter a judgment in his favor and against the Defendant, PQ CORPORATION, in an amount in excess of the jurisdictional limits of this court and for costs associated with bringing this action, and for such other and further relief as this Court deems just and proper.

PLAINTIFF DEMANDS TRIAL BY JURY

Respectfully submitted,



Glenn C. Ronaldson, Attorney for Plaintiff

Glenn C. Ronaldson, Esq.
Ronaldson and Kuchler, LLC
19 S. LaSalle St.
Suite 1402
Chicago, Illinois 60603
(312) 425-2600
Attorney ID 06187334